



U.S. Department of Justice

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June 12, 2025

VIA CM/ECF

The Honorable Mitchell S. Goldberg, Chief Judge

United States District Court

for the Eastern District of Pennsylvania

James A. Byrne U.S. Courthouse, Room 17614

601 Market Street

Philadelphia, PA 19106-1797

Re: *Shapiro v. U.S. Dep't of the Interior*, No. 25-cv-763—Request for
Extension

Dear Chief Judge Goldberg:

I represent Defendants in the above-captioned case and write pursuant to Section 7 of Your Honor's Policies and Procedures for Civil Matters to request another 60-day extension of Defendants' deadline to respond to the complaint. As explained below, there is good cause for this extension and all parties consent to the extension.

This is a suit by the Governor of Pennsylvania and several Pennsylvania agencies challenging an alleged pause of federal funding to Pennsylvania based on certain executive orders and OMB directives. *See* ECF No. 1. Defendants' response to the complaint in this case is currently due on June 16, 2025. *See* ECF No. 11. The parties are engaged in discussions about the most efficient way to proceed in this matter and they hope to be able to resolve this case without the need for further litigation. In light of these discussions, Defendants respectfully submit that it remains inefficient and burdensome for them to respond to the complaint at this time. *Cf.* Fed R. Civ. P. 1 (specifying that the Federal Rules of Civil Procedure should be "administered" and "employed by the court and the parties to secure the just, speedy, and inexpensive determination of every" case).

Defendants thus respectfully request that the Court extend their deadline to respond to the complaint by another 60 days—to August 15, 2025. Undersigned counsel has discussed this request Plaintiffs' counsel and they consent to the requested extension.

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Thank you for your consideration.

Respectfully submitted,

DAVID METCALF
United States Attorney

/s/ Gregory B. in den Berken
GREGORY B. IN DEN BERKEN
Assistant United States Attorney

COMBINED CERTIFICATES

I certify that:

1. On June 12, 2025, a true and correct copy of the foregoing Letter Request for Extension was filed electronically via the Court's CM/ECF system and served via CM/ECF on all counsel of record; and

2. On June 10, 2025, I conferred via email with Plaintiffs' counsel, Jacob B. Boyer, who confirmed that Plaintiffs consent to the relief requested in the foregoing Letter Request.

/s/ Gregory B. in den Berken
GREGORY B. IN DEN BERKEN